

**COMMUNITY SERVICES
BLOCK GRANT (CSBG)
Fiscal Year 2023 Only**

INTRODUCTION

In 1981, the Governor of Vermont designated the Office of Economic Opportunity, administrator of the Community Services Block grant (hereinafter called CSBG). Under the provisions of the Omnibus Budget Reconciliation Act of 1981 (hereinafter called OMBR), and Public Law 98-558, Human Services Reauthorization Act of 1984, and the Augustus F. Hawkins Human Services Reauthorization of 1990 (P.L. 101-501), and the COATS Human Services Reauthorization Act of 1998, the Office of Economic Opportunity has developed a proposed plan for the distribution and use of these funds.

The CSBG program will be used to provide a range of services and activities having a measurable and potentially major impact on the causes and effects of poverty in Vermont. The activities will be directed toward assisting participants with low-income including the elderly poor. A common theme among the local programs is the active participation of low-income people, in tandem with public officials and leaders of the private sector, in the design and implementation of the programs. In addition, these programs share a common goal: the achievement of self-sufficiency, emphasizing self-reliance and institutional change to assist the low-income people they serve. This State Plan is prepared and submitted to comply with the legislative requirements which specify, in order to receive an allotment under this subtitle, an application shall be submitted to the Secretary of the Department of Health and Human Services (hereinafter called HHS). The plan will be submitted to the State legislature for the purpose of conducting public hearings on the proposed use and distribution of the funds.

This plan sets forth the State's policy, goals and objectives for the program, the requirements which sub-grantees must meet to qualify for funds, the manner in which the State intends to distribute the block grant and the procedures the State intends to implement in administering the program. The plan follows the prescribed format from the HHS Office of Community Services.

SECTION 1: CSBG Lead Agency, CSBG Authorized Official, CSBG Point of Contact and Official State Designation Letter

- 1.1. & 1.1a. One Year Plan covering Federal Fiscal Year 2023 (10/1/22-9/30/23)
- 1.2. Provide the following information in relation to the lead agency designated to administer CSBG in the State, as required by Section 676(a) of the CSBG Act.

Human Services Department

Vermont Agency of Human Services

Authorized official: Sarah Phillips, Director, Office of Economic Opportunity
280 State Drive, Waterbury, Vermont 05671
(802) 585-9218
Sarah.phillips@vermont.gov
<http://humanservices.vermont.gov/>

- 1.3. **Designation Letter:** State's official CSBG designation letter and AHS designation letter are attached.
- 1.4. Provide the following information in relation to the designated State CSBG point of contact.

Office of Economic Opportunity, Department for Children & Families, Agency of Human Services

Sarah Phillips, Director, Office of Economic Opportunity
280 State Drive, Waterbury, Vermont, 05671-1050
(802) 585-9218
Sarah.phillips@vermont.gov
<http://dcf.vermont.gov/oeo/>

- 1.5. State Community Action Association. The Vermont Community Action Partnership is the State Association composed of the five eligible entities. BROCC serves as the fiscal agent and CVOEO has 1 part-time employee to provide dedicated staffing for the State Association.

Vermont Community Action Partnership

c/o Champlain Valley Office of Economic Opportunity

Jan Demers
255 S. Champlain Street, Burlington, VT 05401
(802) 777-1954
jandemers@cvoeo.org
www.cvoeo.org

SECTION 2: State Legislation and Regulation

- 2.1. **CSBG State Legislation:** Does the State have a statute authorizing CSBG? Yes
- 2.2. **CSBG State Regulation:** Does the State have regulations for CSBG? No
- 2.3. Attach a copy of legislation and/or regulations or provide a hyperlink(s), as appropriate.
VSA Title 3, Chapter 59, Community Service Agencies
<http://legislature.vermont.gov/statutes/fullchapter/03/059>
- 2.4. **State Authority:**
- 2.4a. Did the State legislature enact authorizing legislation, or amendments to an existing authorizing statute, last year? No
- 2.4b. Did the State establish or amend regulations for CSBG last year? No
- 2.4c. Does the State statutory or regulatory authority designate the bureau, division, or office in the State government that is to be the State administering agency? Yes

SECTION 3: State Plan Development and Statewide Goals

- 3.1. **CSBG Lead Agency Mission and Responsibilities:** Briefly describe the mission and responsibilities of the State agency that serves as the CSBG lead agency.

The mission of the Agency of Human Services is to improve the health and well-being of Vermonters and to protect those among us who are unable to protect themselves. The Agency of Human Services was created by the Vermont Legislature to serve as the umbrella organization for all health and human service activities within state government. The Department for Children and Families, as part of an integrated Agency of Human Services, fosters the healthy development, safety, well-being, and self-sufficiency of Vermonters. The Office of Economic Opportunity is a division of the Department for Children and Families. The mission of the Vermont Office of Economic Opportunity, which administers the Community Services Block Grant, is to increase the self-sufficiency of Vermonters, strengthen Vermont

communities, and eliminate the causes and symptoms of poverty.

3.2. State Plan Goals:

1. to provide a range of services and activities having a measurable and potentially major impact on causes and effects of poverty in the community or those areas of the community where poverty is a particularly acute problem;
2. to provide activities designed to assist participants with low-income, including the elderly poor;
 - a. to secure and retain meaningful employment;
 - b. to attain an adequate education;
 - c. to make better use of available income;
 - d. to obtain and maintain adequate housing and a suitable living environment;
 - e. to obtain emergency assistance through loans or grants to meet immediate and urgent individual and family needs including the need for health services, nutritious food, housing and employment-related assistance;
 - f. to remove obstacles and solve problems which block the achievement of self-sufficiency;
 - g. to achieve greater participation in the affairs of the community; and
 - h. to make more effective use of other programs related to this subtitle;
3. to provide on an emergency basis for the provision of such supplies and services, nutritious foodstuffs and related services, as may be necessary to counteract conditions of starvation and malnutrition among the poor;
4. to coordinate and establish linkages between governmental and other social services programs to assure the effective delivery of such services to individuals with low-income;
5. to encourage the use of entities in the private sector of the community in efforts to ameliorate poverty in the community; and
6. to provide for coordination between anti-poverty programs in each community, where appropriate, with emergency energy crisis programs under Title XXVI of this Act (relating to Low Income Home Energy Assistance) conducted in such community.

State's CSBG-specific goals for State administration:

For the period covered by this State CSBG Plan, the Office of Economic Opportunity has set the following goals for State administration:

1. Support the use of full cycle performance management to document and enhance all programs.

Strategies: The Office will continue to support training and technical assistance to eligible entities by coordinating quarterly Results-Oriented Management and Accountability (ROMA) Community of Practice meetings to improve reporting consistency, offering ROMA training for VT staff based on assessment of needs, helping agencies use CSBG reports to reflect on programs and potential changes in practice, and enhancing reporting processes.

2. Streamline CSBG Administration

Strategies: The Office will continue to offer and provide technical assistance to each eligible entity by finalizing CSBG state manual to summarize all requirements for eligible entities and identify changes to the CSBG onsite monitoring process to reduce administrative burden.

3.3. State Plan Development: Indicate the information and input the State accessed to develop this State Plan.

3.3a. Analysis of:

- X State Performance Indicators and/or National Performance Indicators (NPIs)
- X U.S. Census data
- X State performance management data (e.g., accountability measures, ACSI survey information, and/or other information from annual reports)
- X monitoring visits/assessments

3.3b. Analysis of local-level tools:

- X Eligible entity community needs assessments
- X Eligible entity community action plans
- X Public hearings/workshops

3.3c. Consultation with:

- X Eligible entities (e.g., meetings, conferences, webinars; not including the public hearing)
- X State community action association
- X National Association for State Community Services Programs (NASCSPP)
- X Regional Performance Innovation Consortium (RPIC)
- X Federal CSBG office
- X Regional CSBG T & TA providers

3.4. Eligible Entity Involvement

3.4a. Describe the specific steps the State took in developing the State Plan to involve the eligible entities.

The State Office of Economic Opportunity has discussed the State Plan process and content with the Vermont Community Action Partnership (State Association) at the State Association meeting, which includes the Executive Directors from each of Vermont's five Community Action Agencies. A copy of the plan is sent to each eligible entity for feedback. The eligible entities were also notified of the State Plan public hearing on July 19, 2022.

3.4b. Performance Management Adjustment:

How has the State adjusted State Plan development procedures under this State Plan, as compared to past plans, in order

- 1) to encourage eligible entity participation and
- 2) to ensure the State Plan reflects input from eligible entities?

Any adjustment should be based on the State's analysis of past performance in these areas, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing. If the State is not making any adjustments, provide further detail.

Last cycle, the State discussed the State Plan development procedures with the eligible entities at a State Association meeting, including the timeline determined by the OCS information memoranda on the State application of funds (July) and the joint block grant public hearing (July). The State discussed the State Plan Process with the State Association at a spring meeting and offered to connect individually with any Executive Director interested in learning more about the process. The State then later discussed the State Plan draft with the State Association and requested comments.

3.5. Eligible Entity Overall Satisfaction: 87

SECTION 4: CSBG Hearing Requirements

- 4.1. Public Inspection:** Describe how the State made this State Plan, or revision(s) to the State Plan, available for public inspection, as required under Section 676(e)(2) of the Act.

To be completed post-plan development.

- 4.2. Public Notice/Hearing:** Describe how the State ensured there was sufficient time and statewide distribution of notice of the public hearing(s) to allow the public to comment on the State Plan, as required under 676(a)(2)(B) of the CSBG Act.

The notice for the public hearing was placed in multiple local daily papers. Eligible entities, limited purpose sub-grantees and other interested parties are invited to attend the public and legislative hearings which review this plan. In addition, copies of the plan summary were and are available for public inspection from the Vermont Agency of Human Services website. The Community Action Agencies were notified of the public hearing at their meeting on June 3, 2022. A draft plan was reviewed at the July 1, 2022 meeting. A draft was shared, along with notice of the public hearing with the broader network of providers via email on July 1, 2022.

- 4.3. Public and Legislative Hearings:** Specify the date(s) and location(s) of the public and legislative hearing(s) held by the designated lead agency for this State Plan, as required under Section 676(a)(2)(B) and Section 676(a)(3) of the Act.

Date	Location	Type of Hearing
7/19/22	Waterbury, VT (and virtual)	Public Hearing

The state of Vermont has historically combined its public and legislative hearings. The Joint Fiscal Office/Committee Chairs were invited to the public hearing. Our Commissioner testified on the FY23 budget in House Appropriations on January 26, 2022 and in Senate Appropriations on February 2, 2022. Additional testimony on the budget was presented to the House Human Services Committee February 2, 2022.

- 4.4.** Supporting documentation for the public and legislative hearings is attached.

SECTION 5: CSBG Eligible Entities

5.1. **CSBG Eligible Entities:** In the table below, list each eligible entity in the State, and indicate public or private, the type(s) of entity, and the geographical area served by the entity.

CSBG Eligible Entity	Public or Nonprofit	Type of Entity	Geographical Area Served by county (Provide all counties)
BROC – Community Action in Southwestern Vermont	Nonprofit	Community Action Agency	Rutland, Bennington Counties (except Pittsfield Town)
Capstone Community Action	Nonprofit	Community Action Agency	Lamoille, Orange, Washington Counties, and Pittsfield, Granville, Hancock, Rochester, Bethel, Stockbridge, Royalton, Sharon and Barnard Towns
Champlain Valley Office of Economic Opportunity	Nonprofit	Community Action Agency	Chittenden, Franklin, Grand Isle Counties, and in Addison County (except Hancock and Granville Towns)
Northeast Kingdom Community Action	Nonprofit	Community Action Agency	Caledonia, Essex, Orleans Counties
Southeastern Vermont Community Action	Nonprofit	Community Action Agency	Windham and Windsor Counties (except Rochester, Bethel, Stockbridge, Royalton, Sharon and Barnard Towns)

5.2. Total number of CSBG eligible entities: 5

5.3. **Changes to Eligible Entities List:** Has the list of eligible entities under item 5.1 changed since the State's last State Plan submission?

No.

SECTION 6: Organizational Standards for Eligible Entities

6.1. Choice of Standards:

- The State will use the CSBG Organizational Standards Center of Excellence (COE) organizational standards (as described in IM 138).

6.2. If the State is using the COE-developed organizational standards, does the State propose making a minor modification to the standards, as described in IM 138?

No changes are proposed.

6.3. How will/has the State officially adopt(ed) organizational standards for eligible entities in the State in a manner consistent with the State's administrative procedures act?

- Contracts with eligible entities

6.4. How will the State assess eligible entities against organizational standards, as described in IM 138?

- Self-assessment (with validation by the State or State-authorized third party)
 Regular, on-site CSBG monitoring

6.4a. Describe the assessment process.

The State Office of Economic Opportunity will annually distribute an Organizational Standard Submission Sheet to each agency. Agencies will self-assess and submit the completed tool along with documentation by July 30th of each year. This will provide the State Office the opportunity to review and incorporate the results into the CSBG State Plan. The State Office of Economic Opportunity will review and validate the assessment within 60 calendar days.

Every three years, the State Office of Economic Opportunity will conduct its onsite monitoring of eligible entities. During regular onsite monitoring, staff of the State Office of Economic Opportunity will review documentation onsite and write up a report of their findings. The State Office of Economic Opportunity meets monthly in person with the Vermont Community Action Partnership and will use this time as an opportunity to provide feedback to the network and jointly plan technical assistance and training. Each eligible entity provides quarterly CSBG NPI reports to the State Office. Entities with ongoing technical assistance plans for organizational standards will submit updates, along with supporting documentation, quarterly at the time of NPI report submission.

6.5. Will the State make exceptions in applying the organizational standards for any eligible entities due to special circumstances or organizational characteristics, as described in IM 138?

Not at this time.

6.6. Performance Target: What percentage of eligible entities in the State does the State expect will meet all the State-adopted organizational standards in the next year?

100%

SECTION 7: State Use of Funds

Eligible Entity Allocation (90 Percent Funds) [Section 675C(a) of the CSBG Act]

7.1 Formula: Select the method (formula) that best describes the current practice for allocating CSBG funds to eligible entities.

Other:

Historic Base + Formula with Variables

The amount to be awarded to each Community Action Agency will be determined by the application of the State Office of Economic Opportunity allocation formula. This formula is designed to ensure that each eligible entity receives an amount sufficient to provide an administrative funding base and, further, to ensure that funding to specific areas during subsequent years corresponds to the current economic situation of each area.

Prior to the award of CSBG funds, the Office of Economic Opportunity will reserve 10 percent of the funds awarded; five percent will be used for State administration of the program. With the balance of the funds reserved, the State may:

1. transfer in accordance with Section 675(c)(5) of the CSBG Act; or
2. utilize for the purpose of funding special projects which have proven to be, or may prove to be particularly effective in ameliorating the causes of poverty in communities within the State; or
3. distribute through the allocation formula.

By statute, Vermont shall distribute 90% of its total CSBG award to eligible entities. The Office of Economic Opportunity allocation formula is updated periodically to address the distribution of this statutory 90% to Vermont's five Community Action Agencies while allowing for adjustments to be made as current, local poverty data become available.

The State Office of Economic Opportunity has adopted the FY 2022 Community Action Agencies distributions as the new base levels for funding.

In any year where Vermont receives an increase or decrease in core CSBG funding available to eligible entities—above or below the FY 2017 base level of \$3,305,030—the amount allocated to each eligible entity shall be adjusted with a corresponding percentage increase or decrease in funding. In this way, a 5% increase in Vermont’s CSBG award would result in a 5% increase to each eligible entities’ allocation for that year; likewise in the experience of a decrease to Vermont’s CSBG award.

In FY 2018, the State Office of Economic Opportunity reviewed the formula allocation in partnership with eligible entities, and decided to postpone any amendment to the formula until the next 10-year census data is available for review and analysis.

HISTORICAL NOTE

FY 2010 base awards were arrived at by distributing the historical FFY 1993 base of \$2,051,460 according to the following formula:

- 50% divided equally
- 40% on the basis of eligible population
- 5% on the basis of per capita income
- 5% excess unemployment

and the excess of \$1,305,540 on the basis of each eligible entity’s service territory's share of the State's total eligible population (defined as the number of persons at or below 125% of federal poverty level).

7.1a. Formula Description

Does the State statutory or regulatory authority specify the terms or formula for allocating the 90 percent funds among eligible entities? No.

7.2. Planned Allocation: Specify the planned allocation of 90 percent funds to eligible entities, as described under Section 675C(a) of the CSBG Act. The estimated allocations may be in dollars or percentages.

Planned CSBG 90 Percent Funds	
CSBG Eligible Entity	Funding Amount \$

Planned CSBG 90 Percent Funds	
BROC – Community Action in Southwestern Vermont	\$624,696
Capstone Community Action	\$668,006
Champlain Valley Office of Economic Opportunity	\$1,028,481
Northeast Kingdom Community Action	\$642,056
Southeastern Vermont Community Action	\$544,553
Total	\$3,897,546

- 7.3. Distribution Process:** Describe the specific steps in the State’s process for distributing 90 percent funds to the eligible entities and include the number of days each step is expected to take; include information about State legislative approval or other types of administrative approval (such as approval by a board or commission).

All agencies identified as eligible to apply for funds shall submit an application before the beginning of the grant year in a form prescribed by the State Office of Economic Opportunity in the “Request for Work Plan.” The State Office of Economic Opportunity has developed a Request for Work Plan package for distribution to all eligible entities currently operating programs under the CSBG Act. Work Plans must include a line item budget and a monthly expenditure plan. All Work Plans are reviewed by the State Office of Economic Opportunity within 30 days of receipt. All Community Action Agencies in Vermont that have received funds in the previous fiscal year will be notified as soon as practical, but no less than thirty days before the new fiscal year of status of funding for the upcoming fiscal year.

Funds given to grantees pursuant to this plan must be used in furtherance of the goals and objectives set forth above and will be governed by a grant agreement between the State Office of Economic Opportunity and the sub-grantee as well as this plan and applicable law. The grant agreement shall be based on the sub-grantee's application for funding as approved. The Office of Economic Opportunity may condition the sub-grantee's receipt of the block grant funds on such terms as the State deems appropriate, provided the terms are consistent with and in furtherance of this plan and the Federal law governing CSBG.

A cash advance in an amount sufficient to fund one month’s operation shall be made to each agency upon the effective date of the grant executed with the State Office of Economic Opportunity.

Subsequent transmittals of cash shall be made in monthly payments, which may contain a blend of reimbursement and advance. In the event that a continuing resolution or similar

action should delay the determination of the State's CSBG allocation, or temporarily restrict spending authority, the State Office of Economic Opportunity, may, at its discretion, amend this procedure to restrict payments to reimbursement of actual eligible costs up to a level specified in the Community Action Agency's approved monthly expenditure plan.

- 7.4. Distribution Timeframe:** Does the State plan to make funds available to eligible entities no later than 30 calendar days after OCS distributes the Federal award? Yes.
- 7.5. Performance Management Adjustment:** How is the State improving grant and/or contract administration procedures under this State Plan as compared to past plans? Any improvements should be based on analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing.

The State is working on a consolidation of existing policies and procedures into a single document which it will distribute to eligible entities. The State anticipates that this may reveal the need for revisions or additions to administrative procedures. The State Office of Economic Opportunity regularly solicits and receives feedback from eligible entities on grant administration procedures. The State Office of Economic Opportunity will continue to work with eligible entities to improve grant administration procedures within its purview, to relay feedback to respective units within State government, and to connect eligible entities directly with those units, as appropriate.

Administrative Funds [Section 675C(b)(2) of the CSBG Act]

- 7.6.** What amount of State CSBG funds does the State plan to allocate for administrative activities, under this State Plan? The estimate may be in dollars or a percentage.
- In accordance with Section 675C(b)(2) of the CSBG Act, the State plans to reserve \$55,000 or 5% of its grant (whichever is greater) for administrative activities.
- 7.7.** How many State staff positions will be funded in whole or in part with CSBG funds under this State Plan?
- Three positions are funded in part with CSBG funds under this State Plan.
- 7.8.** How many State Full Time Equivalents (FTEs) will be funded with CSBG funds under this State Plan?
- Approximately 1.5 FTEs will be funded with CSBG funds under this State Plan.

Remainder/Discretionary Funds [Section 675C(b) of the CSBG Act]

7.9. Does the State have remainder/discretionary funds? Yes

If yes was selected, describe how the State plans to use remainder/discretionary funds in the table below.

Use of Remainder/Discretionary Funds		
Remainder/Discretionary Fund Uses (See 675C(b)(1) of the CSBG Act)	Planned %	Brief description of services/activities
a. Training/technical assistance to eligible entities	30%	These planned services/activities are described in State Plan item 8.1
b. Coordination of State-operated programs and/or local programs	20%	Coordination with homeless continua of care and homeless assistance programs.
c. Statewide coordination and communication among eligible entities	0%	n/a
d. Analysis of distribution of CSBG funds to determine if targeting greatest need	0%	n/a
e. Asset-building programs	0%	n/a
f. Innovative programs/activities by eligible entities or other neighborhood groups	20%	Other innovative activities at eligible entities or other community-based nonprofits, such as those addressing food security/systems, supporting adult education, or promising practices to address homelessness.
g. State charity tax credits	0%	n/a
h. Other activities, specify	30%	Unforeseen or urgent requests for eligible entities or other eligible community-based nonprofits; including technical assistance to other community-based nonprofits.
Totals	100%	

7.10. What types of organizations, if any, does the State plan to work with (by grant or contract using remainder/discretionary funds) to carry out some or all of the activities in table 7.9.

- X CSBG eligible entities (if checked, include the expected number of CSBG eligible entities to receive funds): Five eligible entities
- X Other community-based organizations
- X State Community Action association, by way of fiscal agent
- X Individual consultant(s)
- X Other: The State may carry out some activities directly.

7.11. Performance Management Adjustment: How is the State adjusting the use of remainder/discretionary funds under this State Plan as compared to past plans? Any adjustment should be based on the State's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing.

The State will continue to make remainder funds available to eligible entities and the Vermont Community Action Partnership (state association) and to work with the association and entities to plan and implement training and technical assistance.

SECTION 8: State Training and Technical Assistance

8.1. Describe the State’s plan for delivering CSBG-funded training and technical assistance to eligible entities under this State Plan by completing the table below. Add a row for each activity: indicate the timeframe; whether it is training, technical assistance or both; and the topic.

Training and Technical Assistance			
Fiscal Year (Y) Quarter (Q) / Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of “Other”
<ul style="list-style-type: none"> • All quarters 	<ul style="list-style-type: none"> • Technical Assistance 	<ul style="list-style-type: none"> • Reporting • ROMA 	
<ul style="list-style-type: none"> • FY1 – Q4 	<ul style="list-style-type: none"> • Training 	<ul style="list-style-type: none"> • Reporting • ROMA 	
<ul style="list-style-type: none"> • Ongoing / Multiple Quarters 	<ul style="list-style-type: none"> • Both 	<ul style="list-style-type: none"> • Organizational Standards – General • Organizational Standards – for eligible entities with unmet standards on Technical Assistance or Quality Improvement Plans 	
<ul style="list-style-type: none"> • Ongoing / Multiple Quarters 	<ul style="list-style-type: none"> • Both 	<ul style="list-style-type: none"> • Other 	Other: community-level work

Training and Technical Assistance			
Fiscal Year (Y) Quarter (Q) / Timeframe	Training, Technical Assistance, or Both	Topic	Brief Description of "Other"
<ul style="list-style-type: none"> • Ongoing / Multiple Quarters • FY1 – Q3 	<ul style="list-style-type: none"> • Training 	<ul style="list-style-type: none"> • Other 	<p>Other: promising and evidence-based practices in ending poverty</p> <p>Other: cross sector skills or general nonprofit management skills; e.g., leadership development, cultural competency, strategic communication, collective impact, leading change, board development, compassion fatigue, working with different populations, etc.</p>

8.1a. The planned budget for the training and technical assistance plan (as indicated in the Remainder/Discretionary Funds table in item 7.9): 20%

8.1b. Training and technical assistance collaboration: Describe how the state will collaborate with the state association and other stakeholders in the planning and delivery of training and technical assistance.

The State will continue to work with the association and entities to plan and implement training and technical assistance. The Office of Economic Opportunity is in weekly, if not daily, communication with staff and leadership of Eligible Entities and meets monthly with the State Association. Training is always a topic of conversation during meetings, calls, and site visits. OEO actively participates in and collaborates on the planning and creation of the joint T&TA plan with the Vermont Community Action Partnership.

8.2. Does the State have in place Technical Assistance Plans (TAPs) or Quality Improvement Plans (QIPs) for all eligible entities with unmet organizational standards, if appropriate?

The State is currently in the process of the triennial monitoring of each eligible entity, a process which includes a review of the annual assessment of organizational standards for each agency. There are no open Quality Improvement Plans, agencies

with unmet organizational standards have resolved issues or have Technical Assistance Plans in place.

8.2a Address Unmet Organizational Standards: Describe the state's plan to provide T/TA to eligible entities to ensure they address unmet Organizational Standards.

The eligible entities in Vermont have made excellent progress in meeting the Organizational Standards and are building these requirements into their ongoing management practices. OEO offers training at VCAP meetings on specific organizational standards as needed. that are of common interest or challenge to the entities. Resource and peer sharing have been very effective at helping organization fully implement the standards. OEO provides additional technical assistance 1:1 with eligible entities as needed.

8.3. Indicate the types of organizations through which the State plans to provide training and/or technical assistance as described in item 8.1, and briefly describe their involvement? (Check all that apply.)

- X CSBG eligible entities: (if checked, provide the expected number of CSBG eligible entities to receive funds) one
- X State Community Action association
- X National technical assistance provider(s)
- X Individual consultant(s)
- X Other: The State will provide some Training and Technical Assistance directly.

8.4. Performance Management Adjustment: How is the State adjusting the training and technical assistance plan under this State Plan as compared to past plans? Any adjustment should be based on the State's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing.

Based on the analysis of past performance and feedback from eligible entities (positive), the State has not made significant adjustments to the training and technical assistance plan under this State Plan as compared to past plans. The Vermont Community Action Partnership (state association) and the State continue an ongoing partnership approach to support new opportunities to meet training and technical assistance needs of eligible entities. For example, a provider from another state presented to the state association and state regarding their approach to the organizational standards on February 4, 2022. The State is also currently working with a Community Action Agency and the statewide

ROMA workgroup to develop a statewide dashboard to present and analyze quarterly and annual results.

The State will continue to look at eligible entities' performance on the organizational standards and monitoring reports to adjust specific training and technical assistance activities for the year. The State will continue to work closely with eligible entities and the Vermont Community Action Partnership (state association) to develop and implement joint training and/or technical assistance activities.

SECTION 9: State Linkages and Communication

Note: This section describes activities that the State may support with CSBG remainder/discretionary funds, described under Section 675C(b)(1) of the CSBG Act. The State may indicate planned use of remainder/discretionary funds for linkage/communication activities in Section 7, State Use of Funds, items 7.9(b) and (c).

9.1. State Linkages and Coordination at the State Level: Describe the linkages and coordination at the State level that the State plans to create or maintain to ensure increased access to CSBG services to people and communities with low-income under this State Plan and avoid duplication of services (as required by the assurance under Section 676(b)(5)). Describe or attach additional information as needed.

- X State Low Income Home Energy Assistance Program (LIHEAP) office
- X State Weatherization office
- X State Temporary Assistance for Needy Families (TANF) office
- X State Head Start office
- X State public health office
- X State education department
- X State Workforce Innovation and Opportunity Act (WIOA) agency
- X State budget office
- X Supplemental Nutrition Assistance Program (SNAP)
- X State child welfare office
- X State housing office
- X Other

The State Office of Economic Opportunity coordinates with other State Offices to create or maintain access for low income Vermonters and communities to a variety of services and to avoid duplication of services. The State Office of Economic Opportunity is also the State Weatherization Office and administers federal homeless assistance funds. In addition, the State Office is a division within the Department for Children and Families which includes the State Offices for LIHEAP, TANF, Head Start, Child Welfare, and SNAP. The State Office Administering LIHEAP

provides funds to the State CSBG Office, which in turn awards funds to Community Action Agencies to provide outreach services to potential home energy assistance recipients, thus ensuring coordination between anti-poverty programs. In a similar way, the State Office administering SNAP Employment and Training provides funds to the State CSBG Office, which in turn awards funds to Community Action Agencies providing self-employment training to SNAP recipients.

In addition, the State Office coordinates and convenes various task forces and working groups to ensure communication among eligible entities and other State and local service providers. These include: homelessness, housing and asset development. The State Office also participates in a number of inter and intra-Agency groups and initiatives which include various offices such as a housing program for families served by the child welfare office, coordination with the State Agency of Education homeless liaison office, participation in the State Consolidated Plan for Housing, trauma-informed care, financial capability integration within the State TANF program, and more. The State Office is also now participating in Vermont's Climate Council.

As part of the COVID-19 recovery effort, the State Office participates on various task forces and working groups and promotes communication among eligible entities and other State and local service providers. Response and recovery efforts continue in coordination with and the Vermont Department of Health, in particular, with regards to supporting Vermonters with low incomes and those experiencing challenges such as food insecurity and homelessness to access the services provided by eligible entities. The State Office also will maintain a strong relationship with the Vermont Department of Health through its participation in the CDC rural health equity program.

9.2. State Linkages and Coordination at the Local Level: Describe the linkages and coordination at the local level that the State plans to create or maintain with governmental and other social services, especially antipoverty programs, to assure the effective delivery of and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by assurances under Sections 676(b)(5) and (b)(6)). Attach additional information as needed.

The State Office of Economic Opportunity actively participates in both Vermont's Homeless Continua of Care to assure the effective delivery of CSBG services to people and communities with low-income, and to avoid duplication of services. As administrator of federal and state funds for homeless assistance, the State Office also works in direct partnership with local homeless service agencies. The State of Vermont does not have county government; the Agency of Human Services (AHS) employs Field Service Directors in each of the 12 AHS districts. The Field Service Division explicitly seeks to maximize the effectiveness of the human services system in each district of the state and support human services integration within State government and with community partners. The State CSBG Office works in partnership with the Field Services Division

and eligible entities to support local linkages and coordination, especially antipoverty programs as well as the response to COVID-19.

9.3. Eligible Entity Linkages and Coordination

9.3a State Assurance of Eligible Entity Linkages and Coordination: Describe how the State will assure that the eligible entities will coordinate and establish linkages to assure the effective delivery of and coordination of CSBG services to low-income people and communities and avoid duplication of services (as required by the assurance under Section 676(b)(5)). Attach additional information as needed.

The Office of Economic Opportunity has developed a Request for Work Plan package that is distributed to all eligible entities. The Request for Work Plan outlines broad goals and the general activities allowed under the Act, and require detailed sub-grantee responses which delineate specific activities to be undertaken by the sub-grantees in their efforts to achieve the purposes of the Act. The Request for Work Plan is submitted annually before the beginning of the grant year. The FY 2023 Request for Work Plan package is submitted as an attachment to the State Plan.

The Request for Work Plan requires eligible entities to describe how they will coordinate and establish linkages to assure the effective delivery of and coordination of CSBG services as required by Section 676(b)(5) of the CSBG Act.

9.3b State Assurance of Eligible Entity Linkages to Fill Service Gaps: Describe how the eligible entities will develop linkages to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations, according to the assurance under Section 676(b)(3)(B) of the CSBG Act. **[Narrative, 2500 Characters]**

The Request for Work Plan package requires eligible entities to describe how they will develop linkages to fill identified gaps in services and fully meet Section 676(b)(3)(B) of the CSBG Act.

9.4. Workforce Innovation and Opportunity Act (WIOA) Employment and Training Activities: Does the State intend to include CSBG employment and training activities as part of a WIOA Combined State Plan, as allowed under the Workforce Innovation and Opportunity Act (as required by the assurance under Section 676(b)(5) of the CSBG Act)?

Yes. The State has included CSBG employment and training activities as part of a WIOA Combined State Plan.

9.5. Emergency Energy Crisis Intervention: Describe how the State will assure, where appropriate, that emergency energy crisis intervention programs under title XXVI

(relating to Low-Income Home Energy Assistance) are conducted in each community in the State, as required by the assurance under Section 676(b)(6) of the CSBG Act).

The State Office Administering LIHEAP provides funds directly to Community Action Agencies to provide administer crisis fuel services and outreach services to potential home energy assistance recipients, thus ensuring coordination between anti-poverty programs and meeting the requirements of Section 676(b)(6) of the CSBG Act.

- 9.6. State Assurance: Faith-based Organizations, Charitable Groups, Community Organizations:** Describe how the State will assure local eligible entities will coordinate and form partnerships with other organizations, including faith-based organizations, charitable groups, and community organizations, according to the State's assurance under Section 676(b)(9) of the CSBG Act.

The Request for Work Plan package requires eligible entities to describe how they will coordinate and form partnerships with other organizations, including faith-based organizations, charitable groups, and community organizations in order to fully meet Section 676(b)(9) of the CSBG Act.

- 9.7 Coordination of Eligible Entity 90 Percent Funds with Public/Private Resources:** Describe how the eligible entities will coordinate CSBG 90 percent funds with other public and private resources, according to the assurance under Section 676(b)(3)(C) of the CSBG Act.

The Request for Work Plan package requires eligible entities to describe how they will coordinate with other public and private resources in order to fully meet Section 676(b)(3)(C) of the CSBG Act.

- 9.8. Coordination among Eligible Entities and State Community Action Association:** Describe State activities for supporting coordination among the eligible entities and the State Community Action Association.

The State Office of Economic Opportunity regularly attends the Vermont Community Action Partnership meetings (State Community Action Association), currently convened monthly by the Partnership. The Vermont Community Action Partnership includes representatives from all five Vermont eligible entities. The State Office also coordinates with the Partnership on training and technical assistance efforts to support eligible entities, including work through the Regional Performance and Innovative Consortia and related to organizational standards.

- 9.9 Communication with Eligible Entities and the State Community Action Association:** In the table below, describe the State's plan for communicating with eligible entities, the State Community Action Association, and other partners under this State Plan.

Communication Plan		
Topic	Expected Frequency	Format
Vermont Community Action Partnership Meetings: All topics related to implementing the requirements of the CSBG Act, training and technical assistance planning, linkages and coordination at the state and local level, community needs, etc.	Monthly	Meetings/ Presentation
Updates on state or local linkages or coordination, other requirements related to CSBG implementation	As needed, weekly or more	Email; ad hoc web-based meetings or conference calls
Hearings related to the State Plan	Annually	Email
Performance Management "ROMA" Workgroup	Quarterly	In-person & Web-based meetings

9.10. Feedback to Eligible Entities and State Community Action Association: Describe how the State will provide feedback to local entities and State Community Action Associations regarding performance on State Accountability Measures.

Within 60 calendar days of receiving feedback from OCS regarding State performance on State Accountability Measures, the State will share this feedback with the Vermont Community Action Partnership (State Association) and its members, which include all eligible entities, at its monthly meeting or by email.

9.11. Performance Management Adjustment: How is the State adjusting the Communication Plan in this State Plan as compared to past plans? Any adjustment should be based on the State's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing.

Based on feedback from eligible entities, the State is not adjusting its communication plan and will continue to maintain strong communication with eligible entities.

SECTION 10: Monitoring, Corrective Action, and Fiscal Controls

Monitoring of Eligible Entities (Section 678B(a) of the CSBG Act)

10.1. Specify the proposed schedule for planned monitoring visits including: full on-site reviews; on-site reviews of newly designated entities; follow-up reviews – including return visits to entities that failed to meet State goals, standards, and requirements; and other reviews as appropriate.

This is an estimated schedule to assist States in planning. States may indicate "no review" for entities the State does not plan to monitor in the performance period.

CSBG Eligible Entity	Review Type	Target Date	Date of Last Full Onsite Review (if applicable)
BROC – Community Action in Southwestern Vermont	On Site	July, 2022	July, 2019
Capstone Community Action	On Site	July, 2022	July, 2019
Champlain Valley Office of Economic Opportunity	On Site	June, 2022	July, 2019
Northeast Kingdom Community Action	On Site	July, 2022	July, 2019
Southeastern Vermont Community Action	On Site	July, 2022	July, 2019

10.2. Monitoring Policies: Provide a copy of State monitoring policies and procedures by attaching and/or providing a hyperlink.

Please see attached Vermont CSBG Plan Addendum.

10.3. Initial Monitoring Reports: According to the State’s procedures, by how many calendar days must the State disseminate initial monitoring reports to local entities?

45 days.

Corrective Action, Termination and Reduction of Funding and Assurance Requirements
(Section 678C of the Act)

10.4. Closing Findings: Are State procedures for addressing eligible entity findings/deficiencies, and the documenting of closure of findings included in the State monitoring protocols attached above? Yes

10.5. Quality Improvement Plans (QIPs): How many eligible entities are currently on Quality Improvement Plans?

None at this time.

10.6. Reporting of QIPs: Describe the State’s process for reporting eligible entities on QIPs to the Office of Community Services within 30 calendar days of the State approving a QIP?

When an eligible entity is on a Quality Improvement Plan as approved by the State Office of Economic Opportunity, the State Office will notify the Office of Community Services regional contact in writing within 30 calendar days.

10.7. Assurance on Funding Reduction or Termination: Does the State assure, according to Section 676(b)(8), that “any eligible entity that received CSBG funding the previous fiscal year will not have its funding terminated or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b).”

Yes.

Policies on Eligible Entity Designation, De-designation, and Re-designation

10.8. Does the State CSBG statute and/or regulations provide for the designation of new eligible entities?

Yes.

10.8a. If yes, provide the citation(s) of the law and/or regulation. If no, describe State procedures for the designation of new eligible entities.

VSA Title 3, Chapter 59, Community Service Agencies
<http://legislature.vermont.gov/statutes/fullchapter/03/059>

10.8b. If no, describe state procedures for designation of new entities.

n/a

10.9. Does the State CSBG statute and/or regulations provide for termination of eligible entities?

No.

10.9a. If yes, provide the citation(s) of the law and/or regulation.

10.9b. If no, describe State procedures for termination of new eligible entities and how the procedures were made available to eligible entities and the public.

Please see attached Vermont CSBG Plan Addendum. Although Vermont’s CSBG Plan Addendum is not part of the OCS Model State Plan, it is a part of Vermont’s State CSBG Plan submitted for public review/public hearing.

10.10. Does the State CSBG statute and/or regulations specify a process the State CSBG agency must follow to re-designate an existing eligible entity?

No.

10.10a. If yes, provide the citation(s) of the law and/or regulation.

10.10b. If no, describe State procedures for re-designation of existing eligible entities and how the procedures were made available to eligible entities and the public.

Please see attached Vermont CSBG Plan Addendum.

Fiscal Controls and Audits and Cooperation Assurance

10.11. Fiscal Controls and Accounting: Describe how the State's fiscal controls and accounting procedures will a) permit preparation of the SF-425 Federal fiscal reports (FFR) and b) permit the tracing of expenditures adequate to ensure funds have been used appropriately under the block grant, as required by Block Grant regulations applicable to CSBG at 45 CFR 96.30(a).

The State financial system and fund accounting procedures provide strict controls that assure the proper disbursement and accounting for funds paid to the State under the Act. Community Action Agencies awarded funds are required to report on the expenditure of funds (including the amounts and purpose of the expenditures) on a monthly basis, thus allowing for ongoing monitoring of the use of the funds. Community Action Agencies are required to conduct an annual, agency-wide audit of all funds, and to submit those audits to the State.

Estimated draws occur biweekly for administrative and program expenditures. At the beginning of the quarter, AHS calculates an estimate based on the prior quarter's actual expenditures. This amount is divided over the number of draws that will be made during the quarter. Reconciling draws are performed once the reports are completed and included on a quarterly SF-425 report, which the State uses to compare awards, expenditures and draws. When the State determines that they have overdrawn or under drawn federal funds, they perform a reconciling draw to draw in or return the funds.

10.12. Single Audit Management Decisions: Describe State procedures for issuing management decisions for eligible entity single audits, as required by Block Grant regulations applicable to CSBG at 45 CFR 75.521.

Any funds made available to the sub-grantees by the State Office of Economic Opportunity from the CSBG will be audited on an annual basis in accordance with the Standards for Audit of Governmental Organizations, Programs, Activities, and Functions, Guidelines for Financial and Compliance Audits of Federally Assisted programs, and OMB Uniform Guidance. All single audits are reviewed by the State Office and the Internal Audit Group at the Agency of Human Services.

For additional information on eligible entity audits, please see attached Vermont CSBG Plan Addendum.

10.13. Assurance on Federal Investigations: Will the State “permit and cooperate with Federal investigations undertaken in accordance with Section 678D” of the CSBG Act, as required by the assurance under Section 676(b)(7) of the CSBG Act?

Yes.

10.14. Performance Management Adjustment: How is the State adjusting monitoring procedures in this State Plan as compared to past plans? Any adjustment should be based on the State's analysis of past performance, and should consider feedback from eligible entities, OCS, and other sources, such as the public hearing.

The State is not making any significant adjustments to monitoring procedures at this time. The State has streamlined the Organizational Standard Assessment process based on feedback from Eligible Entities and our own internal review.

SECTION 11: Eligible Entity Tripartite Board

11.1. Which of the following measures are taken to ensure that the State verifies CSBG Eligible Entities are meeting Tripartite Board requirements under Section 676B of the CSBG Act?

Review copies of Board meeting minutes

Track Board vacancies/composition

Other: In order to ensure that the board of directors of the Community Action Agencies are constituted in accordance with Section 676B, the Request for Work Plan package to which agencies must respond to receive funds includes a section that requires the names, addresses, and phone numbers of all board members and requires each Community Action Agency to specify the sector each represents (public, private, low-income) as well as the process used to ensure the election of the low-income representatives is in accordance with democratic principles. Additionally, each Community Action Agency is required to denote the offices held and by whom and committee assignments.

11.2. How often does the State require eligible entities (which are not on TAPs or QIPs) to provide updates (e.g., copies of meeting minutes, vacancy alerts, changes to bylaws, low-income member selection process, etc.) regarding their Tripartite Boards?

X Annually

X Other: Contracts with eligible entities for the provision of services require that minutes of the board meetings be submitted to the Office of Economic Opportunity to allow for ongoing monitoring of this requirement. Board rosters must be submitted quarterly and note any changes and the date of vacancies.

11.3. Assurance on Eligible Entity Tripartite Board Representation: Describe how the State will carry out the assurance under Section 676(b)(10) of the CSBG Act that the State will require eligible entities to have policies and procedures by which individuals or organizations can petition for adequate representation on an eligible entities' Tripartite Board.

The Request for Work Plan package requires eligible entities to describe how eligible entities allow individuals and organizations to petition for adequate representation on an eligible entities' Tripartite Board and fully meet Section 676(b)(10) of the CSBG Act.

11.4. Does the State permit public eligible entities to use, as an alternative to a Tripartite Board, "another mechanism specified by the State to assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs" as allowed under Section 676B(b)(2) of the CSBG Act.

n/a – No public entities

Section 12: Individual and Community Income Eligibility Requirements

12.1. Required Income Eligibility: What is the income eligibility threshold for services in the State?

X 125% of the HHS poverty line

12.1a. Describe any State policy and/or procedures for income eligibility, such as treatment of income and family/household composition.

Vermont's Community Action Agencies will use 125% of Federal HHS Poverty Guidelines as the standard for determining CSBG income eligibility. This will be calculated based on a household's gross income in the past 30 days, excluding tax refunds.

12.2 Income Eligibility for General/Short Term Services: For services with limited in-take procedures (where individual income verification is not possible or practical), how does the State ensure eligible entities generally verify income eligibility for services? An example of these services is emergency food assistance.

Documentation: Acceptable forms of documentation include: current pay stubs, bank statements or tax documents; or a printout from the State's Access system showing financial benefits received. If none of the above are available and it is reasonable to assume the household is income eligible, the Community Action Agency may use a written certification, signed by the client and community action staff, showing the household's income in the past thirty days.

Tax Refunds Not Counted as Income: The total amount of a tax refund received – regardless of whether the refund is the result of a refundable credit, over-withholding, or both – is disregarded as income and resources.

Self-Employment: Where a member of the household is self-employed, gross revenues clearly tied to a business, and offset by the legitimate operating expenses of that business, shall not be considered household income. However, any personal income earned through self-employment shall be considered part of household income.

Programs Funded in Part by CSBG: Where a program is partially funded by CSBG, a proportional share of clients served by the program must meet CSBG eligibility guidelines.

Direct Assistance: A household receiving CSBG direct assistance dollars (such as a rental payment to prevent eviction, or a grant to open a small business) must be income eligible at the time of assistance. Their file must contain appropriate documentation. Failure to document eligibility in connection with financial assistance may result in the eligible entity having to repay funds.

12.3. Community-targeted Services: For services that provide a community-wide benefit (e.g., development of community assets/facilities, building partnerships with other organizations), how does the State ensure eligible entities' services target and benefit low-income communities?

Where a program or initiative is partially funded by CSBG, a proportional share of clients served by the program must meet CSBG eligibility guidelines. In the case of community-targeted services, documentation could include county or town-level data from sources such as the census, HUD or the State showing that a proportional share of residents in the targeted geography meets CSBG eligibility.

SECTION 13: Results Oriented Management and Accountability (ROMA) System

13.1. ROMA Participation: In which performance measurement system will the State and all eligible entities participate, as required by Section 678E(a) of the CSBG Act and the assurance under Section 676(b)(12) of the CSBG Act?

X The Results Oriented Management and Accountability (ROMA) System

13.1a. If ROMA was selected in item 13.1, attach and/or describe the State's written policies, procedures, or guidance documents on ROMA.

Please see attached Request for Work Plan.

13.2. Indicate and describe the outcome measures the State will use to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization, as required under Section 676(b)(12) of the CSBG Act?

X CSBG National Performance Indicators (NPIs)

X NPIs and others

Please see attached Request for Work Plan.

13.3. How does the State support the eligible entities in using the ROMA system (or alternative performance measurement system)?

The State Office convenes a quarterly Community Action performance management ("ROMA") workgroup with teams from each eligible entity. This group supports the use of National Performance Indicator reports. This includes technical review for uniformity and consistency which leads to more reliable and meaningful comparisons of results across the state and over time. The group also shares effective practices used at each agency to incorporate the performance reports into planning and implementation (i.e., operationalizing the ROMA cycle). The State Office also provides ROMA orientation and training to Community Action staff and boards as needed.

The State of Vermont has adopted Results Based Accountability (RBA) in statute. RBA and ROMA are similar and complimentary results-driven performance management systems. In recent years, the State Office has offered training and technical assistance to eligible entities to identify how ROMA and the National Performance Indicators can translate into the specific RBA framework.

13.4. Eligible Entity Use of Data: How is the State validating that the eligible entities are using data to improve service delivery?

In addition to the workgroup discussed in 13.3, eligible entities are required to file a quarterly report on the National Performance Indicators to the State Office. The annual Work Plan also requires eligible entities to identify which National Performance Indicators they will track and report, with targets.

Community Action Plans and Needs Assessments

- 13.5.** Describe how the State will secure a Community Action Plan from each eligible entity, as a condition of receipt of CSBG funding by each entity, as required by Section 676(b)(11) of the CSBG Act.

The Request for Work Plan (attached) outlines broad goals and the general activities allowed under the Act, and requires detailed sub-grantee responses delineating specific activities to be undertaken by the sub-grantees in their efforts to achieve the purposes of the Act. The Request for Work Plan provides estimates of sub-grantee awards, and contains the following major components, outlined below:

Program Design (Mission, Community Assessment); ROMA Implementation Plan (Indicators, Targets, Strategies/Services); Management and Administration (Board structure and composition, Sub-grantee's organizational structure, Job descriptions of employees funded with CSBG, Operating procedure by which the sub-grantee identifies eligible clients, Evaluation and control systems); Budget/Financial Management (Line Item Budget, Financial Management Plan); Assurances (Signed assurances relative to activities undertaken and expenditures incurred with CSBG).

Responses to the Request for Work Plan will be utilized in the preparation of the State's annual plan and application for funds under the CSBG program.

Responses to the Request for Work Plan will be utilized in the preparation of the State's grant agreements with eligible entities for the provisions of services. For this purpose, responses to the Request for Work Plan will be evaluated for technical quality, cost reasonableness and cost effectiveness, as well as for the potential of proposed activities to ameliorate the causes and effects of poverty. Only those proposals which meet all the requirements of the Request for Work Plan will be considered.

Once acceptable proposals have been evaluated, representatives of the prospective sub-grantees will be invited to negotiate a grant agreement based on the proposal submitted. The purpose of the negotiations is to arrive at a mutually-agreeable and cost-effective approach to meeting the requirements of the Request for Work Plan and the goals of the program.

Once agreement has been reached in regards to program approach and line item budgets, the State Office of Economic Opportunity will award grants.

- 13.6. State Assurance:** Describe how the State will assure that each eligible entity includes a community needs assessment for the community served (which may be coordinated with community needs assessments conducted by other programs) in each entity's Community Action Plan, as required by Section 676(b)(11) of the CSBG Act.

Each eligible entity is responsible for conducting an assessment of low-income community needs and strengths, establishing service priorities, developing goals and objectives to address the needs identified and prioritized, and build on identified strengths. The State Office of Economic Opportunity recognizes the value of long-term, in-depth planning for the purpose of ensuring the most effective utilization of Federal funds.

All eligible entities will be required to submit, as an integral part of their application, a description of the community assessment process within the service area. Further, the State Office of Economic Opportunity perceives the community assessment to be an ongoing process - needs and strengths are constantly being reassessed through the experience of the sub-grantees and the acquisition of new information. A formal assessment serves as a base from which to judge the changing needs of the community.

The community assessment report should show not only the problems that can be ameliorated by delivery of services, but problems that pinpoint precisely the major causes of poverty in that area; for example, the absence of an industrial base, seasonal employment, a high percentage of families on minimum wage income, etc. The community assessment report should also identify community strengths, including unique community assets and resources which support specific approaches and partnerships. While the State Office of Economic Opportunity does not expect that each sub-grantee will be able to address all problems that are identified in the community assessment, the State expects that the detailed identification of those problems and community strengths will ensure: the appropriate targeting of resources; enable sub-grantees to design specific plans to address problems which build on community strengths; and ensure that the highest return possible is realized through the expenditure of federal funds. The State Office of Economic Opportunity requires an updated community assessment for each new program year.

Please see attached Request for Work Plan.

SECTION 14: CSBG Programmatic Assurances and Information Narrative (Section 676(b) of the CSBG Act)

14.1 Use of Funds Supporting Local Activities

CSBG Services

14.1a. 676(b)(1)(A): Describe how the State will assure “that funds made available through grant or allotment will be used –

- (A) to support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under title IV of the Social Security Act, homeless families and individuals, migrant or seasonal

farmworkers, and elderly low-income individuals and families, and a description of how such activities will enable the families and individuals--

- (i) to remove obstacles and solve problems that block the achievement of self-sufficiency (particularly for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);
- (ii) to secure and retain meaningful employment;
- (iii) to attain an adequate education with particular attention toward improving literacy skills of the low-income families in the community, which may include family literacy initiatives;
- (iv) to make better use of available income;
- (v) to obtain and maintain adequate housing and a suitable living environment;
- (vi) to obtain emergency assistance through loans, grants, or other means to meet immediate and urgent individual and family needs;
- (vii) to achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to –
 - (I) document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and
 - (II) strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;

The State assures that funds meet the requirements of 676(b)(1)(A), (B), and (C) through the Request for Work Plan process previously described. Please see attached Request for Work Plan.

Needs of Youth

14.1b. 676(b)(1)(B) Describe how the State will assure “that funds made available through grant or allotment will be used –

- (B) to address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to

the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as--

- (i) programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and
- (ii) after-school child care programs;

The State assures that funds meet the requirements of 676(b)(1)(A), (B), and (C) through the Request for Work Plan process previously described. Please see attached Request for Work Plan.

Coordination of Other Programs

14.1c. 676(b)(1)(C) Describe how the State will assure “that funds made available through grant or allotment will be used –

- (C) to make more effective use of, and to coordinate with, other programs related to the purposes of this subtitle (including State welfare reform efforts)

The State assures that funds meet the requirements of 676(b)(1)(A), (B), and (C) through the Request for Work Plan process previously described. Please see attached Request for Work Plan.

State Use of Discretionary Funds

14.2 676(b)(2) Describe “how the State intends to use discretionary funds made available from the remainder of the grant or allotment described in section 675C(b) in accordance with this subtitle, including a description of how the State will support innovative community and neighborhood-based initiatives related to the purposes of this subtitle.”

The State describes this assurance under “State Use of Funds: Remainder/Discretionary,” items 7.9 and 7.10

Eligible Entity Service Delivery, Coordination, and Innovation

- 14.3. 676(b)(3)** “Based on information provided by eligible entities in the State, a description of...”

Eligible Entity Service Delivery System

- 14.3a. 676(b)(3)(A)** Describe “the service delivery system, for services provided or coordinated with funds made available through grants made under 675C(a), targeted to low-income individuals and families in communities within the State;

Vermont CSBG 675C(a) funds will be distributed to five eligible Community Action Agencies, which provide services in all fourteen counties in Vermont. These entities, in accordance with their statutory designation, are considered by the State of Vermont to be the lead anti-poverty organization for each of their respective services areas. The State describes the eligible entities in Section 5, *CSBG Eligible Entities*. The State further meets the requirements of 676(b)(3)(A) through the Request for Work Plan process previously described. Please see attached Request for Work Plan.

Eligible Entity Linkages – Approach to Filling Service Gaps

- 14.3b. 676(b)(3)(B)** Describe “how linkages will be developed to fill identified gaps in the services, through the provision of information, referrals, case management, and follow-up consultations.”

The State describes this assurance in the State Linkages and Communication section, item 9.3b.

Coordination of Eligible Entity Allocation 90 Percent Funds with Public/Private Resources

- 14.3c. 676(b)(3)(C)** Describe how funds made available through grants made under 675C(a) will be coordinated with other public and private resources.”

The State describes this assurance in the State Linkages and Communication section, item 9.7.

Eligible Entity Innovative Community and Neighborhood Initiatives, Including Fatherhood/Parental Responsibility

- 14.3d. 676(b)(3)(D)** Describe “how the local entity will use the funds [made available under 675C(a)] to support innovative community and neighborhood-based initiatives related to the purposes of this subtitle, which may include fatherhood initiatives and other

initiatives with the goal of strengthening families and encouraging parenting.”

The State assures that funds meet the requirements of 676(b)(3)(D) through the Request for Work Plan process previously described. Please see attached Request for Work Plan.

Eligible Entity Emergency Food and Nutrition Services

- 14.4. 676(b)(4)** Describe how the State will assure “that eligible entities in the State will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals.”

The State assures that funds meet the requirements of 676(b)(4) through the Request for Work Plan process previously described. Please see attached Request for Work Plan.

State and Eligible Entity Coordination/linkages and Workforce Innovation and Opportunity Act Employment and Training Activities

- 14.5. 676(b)(5)** Describe how the State will assure “that the State and eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services, and [describe] how the State and the eligible entities will coordinate the provision of employment and training activities, as defined in section 3 of the Workforce Innovation and Opportunity Act, in the State and in communities with entities providing activities through statewide and local workforce development systems under such Act.”

The State describes this assurance in the State Linkages and Communication section, items 9.1, 9.2, 9.3a, 9.4, 9.4a, and 9.4b.

State Coordination/Linkages and Low-income Home Energy Assistance

- 14.6. 676(b)(6)** Provide “an assurance that the State will ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to low-income home energy assistance) are conducted in such community.”

The State describes this assurance in the State Linkages and Communication section, items 9.2 and 9.5.

Federal Investigations

14.7. 676(b)(7) Provide “an assurance that the State will permit and cooperate with Federal investigations undertaken in accordance with section 678D.”

The State addresses this assurance in the Fiscal Controls and Monitoring section, item 10.13.

Funding Reduction or Termination

14.8. 676(b)(8) Provide “an assurance that any eligible entity in the State that received funding in the previous fiscal year through a community services block grant made under this subtitle will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in section 678C(b).”

The State addresses this assurance in the Fiscal Controls and Monitoring section, item 10.7.

Coordination with Faith-based Organizations, Charitable Groups, Community Organizations

14.9. 676(b)(9) Describe how the State will assure “that the State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations.”

The State describes this assurance in the State Linkages and Communication section, item 9.6.

Eligible Entity Tripartite Board Representation

14.10. 676(b)(10) Describe how “the State will require each eligible entity in the State to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation.”

The State describes this assurance in the Eligible Entity Tripartite Board section, 11.3.

Eligible Entity Community Action Plans and Community Needs Assessments

14.11. 676(b)(11) Provide “an assurance that the State will secure from each eligible entity in the State, as a condition to receipt of funding by the entity through a community services block grant made under this subtitle for a program, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State plan) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs.”

The State describes this assurance in the ROMA section, 13.5 and 13.6.

State and Eligible Entity Performance Measurement: ROMA or Alternate system

14.12. 676(b)(12) Provide “an assurance that the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to section 678E(b), or an alternative system for measuring performance and results that meets the requirements of that section, and [describe] outcome measures to be used to measure eligible entity performance in promoting self-sufficiency, family stability, and community revitalization.”

The State describes this assurance in the ROMA section, items 13.1, 13.2, 13.3, and 13.4.

Validation for CSBG Eligible Entity Programmatic Narrative Sections

14.13. 676(b)(13) Provide “information describing how the State will carry out the assurances described in this section.”

The State provides information for each of the assurances directly in section 14 or in corresponding items throughout the State Plan.